

**From:** [Bradford.Carrie \(DSHS\)](#)  
**To:** [Vincent.Malott/R6/USEPA/US@EPA](#)  
**Subject:** TEHI Circle Court  
**Date:** 10/18/2012 08:04 AM  
**Importance:** High  
**Attachments:** [Weston\\_Figure\\_1\\_Water\\_Well\\_Location\\_Map.pdf](#)  
[Table\\_of\\_wells.xlsx](#)

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Ok – TCEQ is still saying no...

I know I should probably just let it go, but I am curious how much TEHI funds would actually be needed to do this project, with DSHS contributing staff time and travel funds... What are your thoughts?

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**From:** Joseph Haney [mailto:joseph.haney@tceq.texas.gov]  
**Sent:** Tuesday, October 16, 2012 4:27 PM  
**To:** Bradford,Carrie (DSHS); Michael Honeycutt; Tracie Phillips  
**Cc:** Villanacci,John (DSHS); Pat Robards; Sara Taubman; Holloway,Kitten (DSHS); Maria Lebron  
**Subject:** TEHI project idea

Carrie:

The Remediation Division had an initial preliminary well identification survey conducted around the Willow Park well in 2006. In March 2010, a site inspection sampling event was conducted. In April of 2010 a formal water well survey was conducted by TCEQ's contractor. The survey included a records search of wells within 0.50 mile of the known extent of the affected groundwater as revealed in the site inspection sampling results and a door-to-door search within 0.25 mile to identify additional wells not found in the records search. In June 2010, an expanded site inspection sampling event was conducted. Both sampling events were focused on the drinking water wells; only one irrigation well, originally thought to be a drinking water well, was sampled. The goal was to sample all known drinking water wells within 0.25 mile of the source area and the known extent of the affected groundwater as revealed in the site inspection sampling results, as well as some additional drinking water wells within 0.5 mile as step-out wells. There has been 1 additional drinking water well identified within 0.25 mile which will be sampled by TCEQ and/or EPA. The combined March and June 2010 sampling events resulted in seven wells with documented levels of TCE:

- 3 residential water wells were below MCL
- 2 residential water wells were above MCL
- 1 non-drinking water well was above MCL (this well is no longer in use)
- 1 public water supply well was above MCL (the originally-identified City of Willow Park well)

The Remediation Division: (1) has some confidence that drinking water exposures of concern have been identified and filters put on, (2) views the project as work that Superfund would complete if needed to identify unacceptable exposures, and (3) believe the data do not appear to justify an extensive community-wide search and sampling event by TEHI. They are, however, currently looking at developing ideas for another project. Please see the attached

spreadsheet of sampled wells and a map.

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**From:** Bradford, Carrie (DSHS) [<mailto:Carrie.Bradford@dshs.state.tx.us>]  
**Sent:** Tuesday, October 16, 2012 1:34 PM  
**To:** Joseph Haney; Bradford, Carrie (DSHS); Michael Honeycutt; Tracie Phillips  
**Cc:** Villanacci, John (DSHS); Pat Robards; Sara Taubman; Holloway, Kitten (DSHS)  
**Subject:** RE: TEHII project idea

I spoke with the EPA project manager for the Circle Court site. The information collected by doing this project would be extremely beneficial in addressing community health concerns and determining if there is an immediate concern that needs to be addressed. While well testing is typically done under the Superfund process, due to funding issues, it is uncertain when this would be conducted.

People in the area are concerned about the safety of their drinking water and should not have to wait to find out if their water contains TCE when funds are available to answer this question now.

**Carrie M. Bradford, PhD**  
Toxicologist

Environmental & Injury Epidemiology & Toxicology Unit, MC 1964  
Texas Department of State Health Services  
PO Box 149347  
Austin, Texas 78714-9347

(512) 776-3004  
(800) 588-1248 x3004  
(512) 776-7776 FAX

[www.dshs.state.tx.us/epitox](http://www.dshs.state.tx.us/epitox)

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**From:** Joseph Haney [<mailto:joseph.haney@tceq.texas.gov>]  
**Sent:** Monday, September 24, 2012 10:50 AM  
**To:** Bradford, Carrie (DSHS); Michael Honeycutt; Tracie Phillips  
**Cc:** Villanacci, John (DSHS); Pat Robards; Sara Taubman; Holloway, Kitten (DSHS)  
**Subject:** RE: TEHII project idea

Remediation Division is looking into it.

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**From:** Bradford, Carrie (DSHS) [<mailto:Carrie.Bradford@dshs.state.tx.us>]  
**Sent:** Monday, September 24, 2012 10:03 AM  
**To:** Michael Honeycutt; Tracie Phillips; Joseph Haney  
**Cc:** Villanacci, John (DSHS); Pat Robards; Sara Taubman; Holloway, Kitten (DSHS)  
**Subject:** RE: TEHII project idea

Any updates on this?

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**From:** Michael Honeycutt [<mailto:michael.honeycutt@tceq.texas.gov>]  
**Sent:** Friday, September 14, 2012 4:25 PM  
**To:** Bradford, Carrie (DSHS); Tracie Phillips; Joseph Haney  
**Cc:** Villanacci, John (DSHS); Pat Robards; Sara Taubman; Holloway, Kitten (DSHS)  
**Subject:** RE: TEHII project idea

Hey Carrie,

Let me talk with Remediation to see what their plans are now that it's a Superfund site.

Mike

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**Michael Honeycutt, Ph.D.** | Director, Toxicology Division | TCEQ  
12100 Park 35 Circle, Bldg. F | Austin, Texas 78753 | ☎: (512) 239-1793 | Fax: (512) 239-1794  
✉: [Michael.Honeycutt@tceq.texas.gov](mailto:Michael.Honeycutt@tceq.texas.gov)

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**From:** Bradford, Carrie (DSHS) [<mailto:Carrie.Bradford@dshs.state.tx.us>]  
**Sent:** Friday, September 14, 2012 3:59 PM  
**To:** Tracie Phillips; Joseph Haney  
**Cc:** Villanacci, John (DSHS); Pat Robards; Sara Taubman; Holloway, Kitten (DSHS); Michael Honeycutt  
**Subject:** RE: TEHII project idea

Kip/Tracie –

Please see below for responses to your comments

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**From:** Tracie Phillips [<mailto:tracie.phillips@tceq.texas.gov>]  
**Sent:** Wednesday, September 12, 2012 4:17 PM  
**To:** Bradford, Carrie (DSHS); Joseph Haney  
**Cc:** Villanacci, John (DSHS); Pat Robards; Sara Taubman; Holloway, Kitten (DSHS); Michael Honeycutt  
**Subject:** RE: TEHII project idea

Hi Carrie,

Kip and I looked at this and have some concerns about this meeting the criteria for a TEHI project.

1) At present, this is not a Superfund site. The site has been proposed by EPA, but until it is listed on the NPL it isn't considered a Superfund site. The statutory limitations of the funds are such that they can only be used on Superfund sites.

I just checked and the Circle Court Groundwater Plume NPL site was added to the final listing today September 14, 2012. Therefore, it does fulfill the requirement of being a Superfund site.

2) Sampling of groundwater to determine the extent of a plume is part of the Remediation process (site delineation). If the site is listed on the NPL, sampling of the plume will be conducted to determine the extent. TEHI would then, in effect, be performing work which is part of the site

delineation process and duplicating Superfund work.

The purpose of the proposed project would not be to determine the extent of contamination which would be part of the remediation process. Rather, we would be conducting an exposure investigation to fill a data gap on whether exposure to the site contaminant (TCE) is occurring through private wells. Although there has been some well testing there are many more wells that lie within the suspected plume area that have not been tested and may never be tested for one reason or another.

Given the above information, this project is clearly within the defined purposes of TEHI where TEHI funds would be used to sample private wells to address community concerns regarding exposure to site contaminants. Additionally, depending on the results, these data could be used to provide EPA with recommendations to reduce and prevent exposures.

Also, I'm not sure if you're aware of the Section 26.408 Impact Evaluation Team (formerly House Bill 3030) at TCEQ, but they send out notices to private well owners when contamination is detected in groundwater. The notices go out to everyone within a ¼ mile from where the contamination was detected. It is worth noting that notices have gone out to citizens in this area for TCE contamination in 2003, 2006, and 2010. Notices give the contamination found and a link to a website where citizens can view a list of laboratories that are authorized to perform the appropriate analyses if they choose to have their wells tested.

Sending out notices to individuals is fine however, when walking the neighborhoods and talking with people, very few were aware of the groundwater contamination and after hearing about it became concerned about possible exposure through their wells. With respect to laboratory testing, for naturally occurring contaminants found in the groundwater recommending they have their water tested by an outside laboratory is reasonable, expecting homeowners to bear the costs of testing for contamination at a site that has become a superfund is not.

At this point, it seems we have done our due diligence to come up with a TEHI project for the remainder of the money. It may be time to have Pat look into sending the money to the Remediation Division so that they have time to use it on a Superfund Site. What do you think?

Given the above information, this project is clearly within the defined purposes of TEHI where TEHI funds would be used to sample private wells to address community concerns regarding exposure to site contaminants. Additionally, depending on the results of the data they could be used to provide EPA with appropriate cease and/or reduce exposure recommendations.

We realize that with the given constraints it has been difficult to find projects that fit the mission of TEHI; however, this project falls in line with the mission and as the testing would only cost about \$100 or less per sample, it would utilize only a small portion of the remaining \$435,000 for the biennium. If TCEQ does not wish to pursue other potential ideas for TEHI projects the remaining funds would be available to be reallocated as appropriate within your agency.

Tracie

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**From:** Bradford, Carrie (DSHS) [<mailto:Carrie.Bradford@dshs.state.tx.us>]  
**Sent:** Monday, September 10, 2012 1:02 PM  
**To:** Joseph Haney; Tracie Phillips  
**Cc:** Villanacci, John (DSHS); Pat Robards; Sara Taubman; Holloway, Kitten (DSHS)  
**Subject:** TEHII project idea

There is a somewhat new Superfund site in Willow Park (near Weatherford) that is a TCE groundwater plume. TCEQ has done some groundwater sampling over the years, but the extent of contamination has not yet been determined. EPA proposed the site in March and recently had a community meeting to let the community know what their plans are.

Because they have limited funding available, it sounds like EPA is going to do some passive soil gas sampling and then geophysical logging of water wells and updating well construction and location information. Sampling of private water wells and groundwater investigation is last on their list.

We spent a week out there talking to people back in July. A lot of people have private wells that they use in and around their home, and a lot of people are concerned about their water. It was difficult for us to talk to people and try to ease their fears without having extensive sampling data and knowing where all the contaminated wells are.

I think a good TEHII project would be to offer TCE water testing for people throughout the Willow Park area. I would confirm with both TCEQ and EPA staff, but it seems that the contamination is limited to just TCE, so we could test a bunch of wells and focus on just TCE.

As we are already in September of the second half of the biennium and have nearly \$435,000 left, we really need to get moving on whatever project(s) we are going to do.

Let me know your thoughts.

**Carrie M. Bradford, PhD**  
Toxicologist

Environmental & Injury Epidemiology & Toxicology Unit, MC 1964  
Texas Department of State Health Services  
PO Box 149347  
Austin, Texas 78714-9347

(512) 776-3004  
(800) 588-1248 x3004  
(512) 776-7776 FAX

[www.dshs.state.tx.us/epitox](http://www.dshs.state.tx.us/epitox)